

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

FILED

2013 AUG 19 A 11:19

U.S. BANKRUPTCY COURT  
E.D. MICHIGAN, DETROIT  
Chapter 9  
Case No. 13-53846  
Hon. Steven W. Rhodes

In re  
CITY OF DETROIT, MICHIGAN,  
Debtor

OBJECTIONS TO THE PETITION FILED BY ONE KEVYN D. ORR SEEKING TO  
COMMENCE A CASE UNDER CHAPTER 9 OF TITLE 11 OF THE UNITED STATES  
CODE ON BEHALF OF THE CITY OF DETROIT, MICHIGAN

I, Judith West (dob: 6/2/51), received a notice by mail on or about 8/14/2013 identifying me as possible creditor or interested party in the above captioned matter. In response to said notice, I do hereby file objections to the petition filed by Kevyn D. Orr, seeking to commence a case under Chapter 9 of the U.S. Bankruptcy Code on behalf of the City of Detroit, Michigan, and in support of said objections, I state the following:

OBJECTIONS

1. I am a creditor or interested party in the purported bankruptcy filed by Kevyn D. Orr.
2. Pursuant to Michigan Public Act 436 of 2012, Kevyn Orr was appointed emergency manager of City of Detroit by Michigan Governor, Rick Snyder on or about February 22, 2013.
3. Kevyn Orr filed this pending petition for bankruptcy on behalf of the City of Detroit, Michigan; however, there is no provision in Chapter 9, that gives Kevyn Orr the authority to file this petition.
4. Under Chapter 9 only the duly elected representatives of the City of Detroit have power and authority to file such a petition. Kevyn Orr is an agent of the State of Michigan, whose relationship to the City of Detroit is that of an interested party.
5. To allow an agent of the State of Michigan to take the City of Detroit into Chapter 9 bankruptcy without consent from the duly elected representatives of the City of Detroit, is tantamount to an involuntary bankruptcy, which is not allowed under Chapter 9.
6. There are several civil matters pending in the United States District Court which preceded the bankruptcy action which challenge whether the emergency manager laws in the State of Michigan, including Public Act 436 of 2012, are constitutional and this Court either does not, or may not, have jurisdiction over these matters.
7. The captioned bankruptcy proceedings should be stayed and this Honorable Court should formally request expedited consideration of all pending litigation raising legal and

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**PROOF OF SERVICE**

I hereby assert that on August 19, 2003, I filed the above Objections to the Petition Filed by One Kevyn D. Orr Seeking to Commence a Case Under Chapter 9 of Title 11 of the United States Bankruptcy Code on Behalf of the City of Detroit and served said Objections upon the following parties of record via United States Mail.

  
\_\_\_\_\_  
Name

**Counsel to the Debtor**

David G. Heiman, Esq.  
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DATED: August 19, 2013